

I Institute of Transportation Engineers

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April 10, 2001

Magalie Roman Salas
Secretary
Federal Communication Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington, DC 20554

Dear Secretary Salas:

Re: Opposition to the Petitions for Reconsideration in the proceedings entitled, “The Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105.”

The Institute of Transportation Engineers (ITE) respectfully submits these comments in response to the Public Notice issued by the Federal Communication Commission concerning the above-referenced Petitions for Reconsideration. ITE strongly opposes the efforts of wireless carriers to seek exemption from the requirement that they complete 511 traveler information service calls on their networks.

ITE is an organization of 15,000 members in more than 85 countries. Over 11,500 ITE members practice their profession in the United States. Federal, state, local governments, private consultants, industry, and academia employ them. Their work spans the disciplines of planning, design, engineering, and operations. These professionals are responsible for the safe, efficient, and environmentally compatible movement of people and goods on our nation's streets, highways, and transit systems.

It is ITE's policy to promote and support the development and application of effective travel demand management (TDM) programs in the private and public sectors. ITE believes that implementation of a national three-digit telephone number for traffic and traveler information will ensure better quality real time traffic information and become a major tool to our members in the battle to alleviate traffic congestion through improved management of person and vehicle trip demand by altering the timing of travel to less-congested time periods. As such, the national three-digit traffic and traveler information number will support energy conservation, air quality, and other environmental objectives. Traveler safety is also a key part of ITE's mission. Unforeseen congestion tends to create hazardous travel conditions. Access to traveler information can lead to people choosing less congested routes or alternate modes, resulting in a positive impact on safety.

A recently released survey by the U.S. Department of Transportation indicates that traffic flow and safety top the list of highway characteristics which the traveling public believes should receive the most attention and resources in coming years. Sixty Eight percent of those polled indicated their community's transportation system could better serve them if they were provided quality traffic information. While this data was not available to the FCC during its deliberations on a national three-digit phone number for traveler information services it intuitively knew the importance of accurate and timely information to the quality of life of our nation's citizens.

The majority of calls to 511 services are expected to come from mobile phones. As such, the wireless industry is a critical partner to ensure that this national system succeeds. To not require wireless participation would doom this promising and achievable effort to failure. This would be unfortunate and

difficult to explain to a public that is clamoring for more and better information so they can make intelligent transportation choices.

As a partner with ITS America, the U.S. Department of Transportation, the American Association of State Highway and Transportation Officials, the American Public Transportation Association and others, ITE has been working to develop a framework by which 511 services will be deployed. Since the FCC's decision to designate "511" as the national, three-digit phone number for traveler information services ITE members have been working at all levels of government to make this service a reality. While technical difficulties with this project vary from location to location, none are insurmountable.

In reviewing the wireless industry's Petition for Reconsideration ITE was particularly frustrated by the assertion that a 511 service will create a government monopoly for traveler information. Weather forecast information, available in most communities via the phone, can never be described as holding a monopoly on this type of information. Weather information abounds on the Internet, television, radio, and in print. In addition, the FCC decision does not prevent a wireless carrier from providing their own traveler information service, nor does it prevent a community from contracting out this service to a wireless carrier. In fact, it is very likely that the private sector will be very much a partner in many 511 traveler information networks.

ITE believes that the traveling public will embrace the use of the 511 traveler information system just as it has the 911 system that was established for emergency calls. For example, through most of 1996 and 1997 Ohio and Kentucky independently operated traveler information systems for telephone and cell phone users. In March of 1998, both states implemented a 211 system, after public education and awareness efforts these states saw a 91% increase in their systems use.

A national land and wireless 511 telephone number will make travel and traffic information available to everyone, regardless of economic status, place of residence or means of travel. There is a clear public need for a national 511 telephone number as three out of four household trips (one or more members of a household traveling together) within the United States were taken in personal use vehicles in 1995. Americans took about 505 million long-distance personal use vehicle trips, resulting in over 280 billion vehicle miles of travel on the nation's highways. The median round-trip distance for long-distance personal use vehicle trips was 368 miles. As Americans travel these 280 billion miles, most outside familiar surrounding, it seems clear that their safety and the efficiency of the nation's transportation infrastructure would benefit only if wireless carriers participate in the 511 traveler information system.

In summation, the Institute of Transportation Engineers strongly opposes efforts to exempt wireless carriers from the requirement that they complete 511 calls on their networks. There is no doubt that this new tool will enhance the dissemination of traffic information and will contribute to efforts to mitigate congestion.

Sincerely,

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Thomas W. Brahms
Executive Director